

**Objection Deadline: June 15, 2023**

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**THIRTIETH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
APRIL 1, 2023 THROUGH APRIL 30, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>April 1, 2023 – April 30, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	\$58,710.50 <u>80% of which is \$46,968.40</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$98.90</u>
TOTAL (80% of fees and 100% of costs)	<u>\$47,067.30</u>

**This is the thirtieth monthly fee statement.**

**PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirtieth monthly statement (the “Monthly Statement”) for the period from April 1, 2023 through April 30, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests: (a) interim allowance and payment of compensation in the amount of \$46,968.40 (80% of \$58,710.50) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair, and (b) reimbursement of actual and necessary costs and expenses in the amount of \$98.90.

**FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	24.60	\$23,985.00
Jesse Bair	Partner	2020	2013	\$625	41.90	\$26,187.50
Nathan Kuenzi	Associate	N/A	2020	\$420	.10	\$42.00
Brian Cawley	Associate	N/A	2020	\$420	17.90	\$7,518.00
Leakhena Au	Associate	N/A	2020	\$420	.10	\$42.00
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	1.80	\$648.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
<b>TOTAL:</b>					<b>87.20</b>	<b>\$58,710.50</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients **by June 15, 2023** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To

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the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: May 30, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

## Burns | Bair

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Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 5/10/2023

**Bill # :** 01141

**Matter:** Insurance

### PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2023	Jesse Bair	Correspond with B. Cawley re BSA analysis project (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Additional analysis of materials re recent Diocesan insurance activities (.1); correspondence with I. Nasatir re recent Diocesan insurance activities (.1);	0.20	\$125.00
4/3/2023	Jesse Bair	Review correspondence from the Court re preliminary injunction hearing logistics (.1); participate in call with PSZJ team re same and related preparations (.4); participate in follow-up call with I. Nasatir re preliminary injunction insurance issues (.1);	0.60	\$375.00
4/3/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (4.0); analyze and summarize bankruptcy court holding for case law discussed by district court (1.9);	5.90	\$2,478.00
4/3/2023	Jesse Bair	Analyze recent KCIC article re Arrowood's financial condition (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Review the Debtor's reply in support of its tenth omnibus claims objection (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Review current draft of the Committee's preliminary injunction exhibit list (.1); review and respond to correspondence with G. Greenwood and I. Nasatir re potential additions to same (.2);	0.30	\$187.50
4/3/2023	Jesse Bair	Review G. Greenwood's draft language for the proposed joint pre-trial order re the preliminary injunction hearing (.1);	0.10	\$62.50

4/3/2023	Timothy Burns	Conference with J. Bair re preliminary injunction hearing strategy (.3); review agenda for April 5 hearing (.1); review Diocese reply brief re 10th Omnibus Claims Objection (.1); review the parties' status letter to the Court in LMI adversary proceeding (.1); review KCIC article re Arrowood's financial condition (.1); review Diocese of Brooklyn decision re Arrowood (.1); review Parishes' response re preliminary injunction motion (.1); review Merson Law plaintiffs' joinder re preliminary injunction motion (.1); review the Diocese's Ninth Omnibus Objection reply brief (.2);	1.20	\$1,170.00
4/3/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and upcoming preliminary injunction hearing (.3);	0.30	\$187.50
4/4/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing insurance projects (.1)	0.10	\$42.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re preliminary injunction insurance strategy (.2);	0.20	\$125.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
4/4/2023	Timothy Burns	Review correspondence with J. Stang and state court counsel re appointment of mediator and related case issues (.2); participate in BB team meeting re case status and ongoing insurance projects (.1); review K. Dine correspondence re case developments and next-steps (.1); conference with J. Bair re preliminary injunction hearing issues (.2); participate in conference with J. Bair re Arrowood strategy (.1); conference with J. Bair re motion to dismiss strategy from insurance standpoint (.2);	0.90	\$877.50
4/4/2023	Brian Cawley	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$42.00
4/4/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (4.0); continue analyzing bankruptcy court decision for information relevant to district court opinion (1.8); research case law relied upon by district court in connection with finalizing insurance summary (.7);	6.50	\$2,730.00
4/4/2023	Jesse Bair	Review K. Dine correspondence with state court counsel and Committee re case update and next-steps (.1);	0.10	\$62.50
4/4/2023	Jesse Bair	Participate in conference with T. Burns re motion to dismiss insurance issues (.2);	0.20	\$125.00
4/4/2023	Brenda Horn	Draft monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
4/4/2023	Jesse Bair	Analyze recent decision in the Arrowood v. Diocese of Brooklyn case for insurance issues relevant to DRVC matter (.2); draft status update to PSZJ team re same (.1);	0.30	\$187.50

4/4/2023	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$42.00
4/4/2023	Jesse Bair	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$62.50
4/4/2023	Alyssa Turgeon	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$36.00
4/4/2023	Jesse Bair	Review motion to dismiss scheduling order (.1);	0.10	\$62.50
4/5/2023	Jesse Bair	Review correspondence with I. Nasatir and K. Brown re preparations for cross of K. Porter in connection with preliminary injunction hearing (.1);	0.10	\$62.50
4/5/2023	Jesse Bair	Review revised version of the Committee's proposed preliminary injunction exhibit list (.1); review correspondence with PSZJ team re same (.1);	0.20	\$125.00
4/5/2023	Jesse Bair	Review the Committee's motion to dismiss discovery requests served on the Diocese (.2);	0.20	\$125.00
4/5/2023	Timothy Burns	Attend hearing on claims objections for insurance purposes (3.0); participate in conference with J. Bair re preliminary injunction hearing presentation issues (.4);	3.40	\$3,315.00
4/5/2023	Jesse Bair	Review correspondence with PSZJ and the court re preliminary injunction hearing logistics (.1); participate in conference with T. Burns re preliminary injunction hearing presentation issues (.4);	0.50	\$312.50
4/5/2023	Jesse Bair	Attend hearing on claims objections for insurance purposes (3.0);	3.00	\$1,875.00
4/5/2023	Brian Cawley	Finish drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (5.4);	5.40	\$2,268.00
4/5/2023	Jesse Bair	Participate in call with I. Nasatir and G. Greenwood re preliminary injunction insurance exhibits (.3);	0.30	\$187.50
4/6/2023	Jesse Bair	Participate in portion of conference with PSZJ team re ongoing case issues for insurance purposes (.5);	0.50	\$312.50
4/6/2023	Timothy Burns	Review the Committee's motion to dismiss discovery requests (.2); review the Diocese's motion to dismiss discovery requests (.2);	0.40	\$390.00
4/6/2023	Jesse Bair	Review correspondence from K. Dine re case developments and motion to dismiss discovery (.1);	0.10	\$62.50
4/6/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction hearing exhibits (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Review C. Moore preliminary injunction direct testimony declaration (.2);	0.20	\$125.00
4/7/2023	Jesse Bair	Review K. Porter preliminary injunction direct testimony declaration (.3); review K. Brown's potential objections to same (.1);	0.40	\$250.00
4/7/2023	Jesse Bair	Review and respond to correspondence with PSZJ team re the parishes' preliminary injunction response and potential reply to same (.2);	0.20	\$125.00
4/7/2023	Jesse Bair	Review the Diocese's letter to the Court re its 6th omnibus claims objection (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Review the Committee's motion to dismiss 30(b)(6) notice on the Diocese (.1);	0.10	\$62.50



4/7/2023	Jesse Bair	Review the Diocese's preliminary injunction reply brief (.7);	0.70	\$437.50
4/7/2023	Jesse Bair	Review the Diocese's preliminary injunction exhibit list (.1); review correspondence with K. Brown, G. Greenwood, and I. Nasatir re same (.1);	0.20	\$125.00
4/7/2023	Jesse Bair	Review E. Stephens preliminary injunction direct testimony declaration (.2);	0.20	\$125.00
4/9/2023	Jesse Bair	Analysis re insurance-related motion to dismiss discovery requests served on the Committee (.3); review and respond to various correspondence with A. Kornfeld, I. Nasatir, and G. Brown re potential responses to same (.3);	0.60	\$375.00
4/9/2023	Jesse Bair	Review additional correspondence with K. Brown re particular argument raised by the Diocese in its preliminary injunction reply brief (.1); review K. Dine suggested response to same (.1);	0.20	\$125.00
4/9/2023	Jesse Bair	Review and respond to correspondence with K. Brown re potential reply to the parishes' preliminary injunction response (.2);	0.20	\$125.00
4/9/2023	Jesse Bair	Review K. Brown correspondence re the Diocese's Section 157(b)(5) preliminary injunction argument and potential response to same (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Draft analysis of potential objections to and cross of K. Porter preliminary injunction direct testimony (.7);	0.70	\$437.50
4/10/2023	Jesse Bair	Respond to G. Brown correspondence re insurance-related motion to dismiss discovery and prior insurance-related document productions from the Diocese (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Analyze various district court orders referring the insurance actions to Magistrate Judge Cave for settlement purposes (.2); correspondence with PSZJ team re same (.2); correspondence with Reed Smith re same (.1);	0.50	\$312.50
4/10/2023	Jesse Bair	Review current draft of the parties' proposed joint pre-trial order (.2); correspondence with K. Brown, I. Nasatir, and G. Greenwood re same (.2);	0.40	\$250.00
4/10/2023	Jesse Bair	Review and edit current draft of the Committee's responses to the Diocese's motion to dismiss discovery requests (1.0);	1.00	\$625.00
4/10/2023	Jesse Bair	Analyze insurer settlement status and exposure analysis in advance of upcoming settlement call with Magistrate Cave (.2); correspondence with J. Stang re same (.1);	0.30	\$187.50
4/10/2023	Jesse Bair	Review correspondence with PSZJ and the Diocese re preliminary injunction exhibits and objections (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review K. Dine correspondence re case developments (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re preliminary injunction strategy (.1);	0.10	\$62.50

4/11/2023	Jesse Bair	Review revised version of the joint pre-trial order circulated by the Diocese (.1); review correspondence with PSZJ and the Diocese re same (.1);	0.20	\$125.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to K. Porter's direct testimony declaration (.4); review correspondence with I. Nasatir re same (.1);	0.50	\$312.50
4/11/2023	Timothy Burns	Analysis of Plan insurance options and settlement strategies (1.2); conference with J. Bair re same (.2); conference with J. Bair re meet and confer with Reed Smith re magistrate settlement conference (.1);	1.50	\$1,462.50
4/11/2023	Jesse Bair	Review the Diocese's motion to dismiss witness list (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review additional district court orders referring the insurance actions to Magistrate Cave for settlement purposes (.2); review and respond to correspondence with PSZJ team re same (.2); correspondence with Reed Smith re same and meet and confer call (.1); participate in conference with T. Burns re same (.1);	0.60	\$375.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to E. Stephen's direct testimony declaration (.2);	0.20	\$125.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to C. Moore's direct testimony declaration (.3);	0.30	\$187.50
4/11/2023	Jesse Bair	Participate in conference with T. Burns re insurance-related Plan strategy (.2);	0.20	\$125.00
4/12/2023	Jesse Bair	Prepare for Reed Smith settlement conference meet and confer (.1); participate in pre-meeting conference with T. Burns re mediation strategy (.2); participate in Reed Smith settlement conference meet and confer (.4); participate in post-meeting conference with T. Burns re outcome of same and potential next-steps in advance of Friday call with Magistrate Judge Cave (.3);	1.00	\$625.00
4/12/2023	Jesse Bair	Review revised version of Porter direct testimony objection (.1);	0.10	\$62.50
4/12/2023	Jesse Bair	Review and consider additional settlement-related orders entered in the insurance district court actions (.2); correspondence with PSZJ team re same (.1);	0.30	\$187.50
4/12/2023	Jesse Bair	Participate in conference with PSZJ re mediation strategy and upcoming settlement conference call with Magistrate Judge Cave (.5); participate in post-call with T. Burns re same and next-steps (.2);	0.70	\$437.50
4/12/2023	Jesse Bair	Analysis re Arrowood's most recent statutory annual statement re the company's financial condition (.1);	0.10	\$62.50
4/12/2023	Jesse Bair	Review correspondence with K. Brown, I. Nasatir, and G. Greenwood re potential changes to the Committee's preliminary injunction exhibits (.1);	0.10	\$62.50

4/12/2023	Timothy Burns	Prepare for meet and confer with Reed Smith re mediation hearing before magistrate (.4); pre-meeting with J. Bair re same (.2); participate in meet and confer with Reed Smith (.4); post-meeting with J. Bair re follow-up (.3); participate in calls with state court counsel re same (.3); participate in conference with PSZJ re mediation strategy (.5); post-call with J. Bair re same and next-steps (.2); further consideration of mediation issues in advance of upcoming call with magistrate Cave (.5);	2.80	\$2,730.00
4/13/2023	Jesse Bair	Correspondence with I. Nasatir re Diocesan insurance coverage chart (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Analyze prior insurer settlement offers and counters (.1); draft insurance settlement overview for T. Burns in preparation for initial settlement call with Judge Cave (.1);	0.20	\$125.00
4/13/2023	Jesse Bair	Preliminary review of BSA decision relied upon by the Diocese in its preliminary injunction reply brief (.2); answer I. Nasatir question re same (.1); review related correspondence with I. Nasatir re same (.1);	0.40	\$250.00
4/13/2023	Jesse Bair	Correspondence with Reed Smith re meet and confer issues in advance of initial settlement call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Jesse Bair	Correspondence with PSZJ team re preliminary injunction hearing logistics (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Review mediation order entered in the bankruptcy case in preparation for initial settlement call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Jesse Bair	Review Judge Cave's settlement conference standing order in preparation for initial settlement call with Judge Cave (.2); correspondence with PSZJ team re same (.1);	0.30	\$187.50
4/13/2023	Timothy Burns	Email to paralegal re mediation materials (.1); met with J. Bair re mediation hearing issues (.1);	0.20	\$195.00
4/13/2023	Jesse Bair	Participate in conference with PSZJ team for insurance purposes re litigation strategy and ongoing case issues (1.0);	1.00	\$625.00
4/13/2023	Jesse Bair	Participate in conference with T. Burns re upcoming settlement conference call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Alyssa Turgeon	Research and identify various insurance case materials needed for review by T. Burns to prepare for upcoming mediation call with Judge Cave (1.7);	1.70	\$612.00
4/13/2023	Jesse Bair	Review correspondence with G. Greenwood and K. Brown re preliminary injunction joint pretrial order (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Review monthly PSIP information received from the Debtor (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Review draft letter to the Court re the Committee's position re the parishes' and Diocese's position re enforcement of CVA judgments against parishes assets (.1);	0.10	\$62.50

4/14/2023	Jesse Bair	Review final version of the Committee's responses to the Diocese's motion to dismiss discovery requests (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Participate in call with J. Stang, K. Dine, and T. Burns re outcome of Judge Cave initial settlement conference call and next-steps re case mediation (.3);	0.30	\$187.50
4/14/2023	Jesse Bair	Participate in initial settlement conference call with Judge Cave (1.0); participate in post-call conference with T. Burns re outcome of same and next-steps (.2);	1.20	\$750.00
4/14/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re litigation and mediation updates and strategy (.8);	0.80	\$500.00
4/14/2023	Timothy Burns	Detailed review of case insurance materials in preparation for mediation call with Magistrate Judge Cave and the insurers (2.4); conference with J. Bair re same (.3); participate in call with Reed Smith re same (.2); participate in mediation call with Judge Cave and the insurers (1.0); participate in post-hearing conference with J. Bair re outcome of same and next-steps (.2); post-hearing call with PSZJ and J. Bair re same (.3); participate in calls with state court counsel re Arrowood issues (.4); participate in state court counsel meeting for insurance purposes re mediation strategy (.8);	5.60	\$5,460.00
4/14/2023	Jesse Bair	Prepare for initial settlement conference call with Judge Cave, including conference with T. Burns re same (.4);	0.40	\$250.00
4/14/2023	Jesse Bair	Review the Diocese's letter to the Committee re the scope of the preliminary injunction order and the related insurance schedules (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Review correspondence from P. Van Osselaer re mediation developments (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Review the Debtor's letter to the Court objecting to potential Bishop deposition (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Review the Committee's letter to the Court re potential Bishop deposition (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Correspondence with I. Nasatir re the agreed coverage summary (.1);	0.10	\$62.50
4/16/2023	Jesse Bair	Review and edit draft Porter cross examination for trial (2.1); correspondence with I. Nasatir re same (.1);	2.20	\$1,375.00
4/16/2023	Jesse Bair	Review K. Brown correspondence re insurance preliminary injunction arguments (.1);	0.10	\$62.50
4/16/2023	Jesse Bair	Research case law supporting the proposition that insurers act in bad faith if they tender their per occurrence limits solely to end their duty to defend (.4); correspondence with I. Nasatir re same (.1);	0.50	\$312.50
4/16/2023	Jesse Bair	Additional analysis of BSA opinion cited by the Diocese in support of its preliminary injunction reply brief (.2); review and respond to I. Nasatir correspondence re same (.2);	0.40	\$250.00

4/16/2023	Timothy Burns	Review Diocese's apex deposition letter (.1); review the Committee's response to same (.1); review letter from Committee to Judge Glenn re need for court approval before executing on CVA judgment against parish assets (.1);	0.30	\$292.50
4/17/2023	Jesse Bair	Review draft Committee response to the Diocese's letter re meet and confer re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Review and consider judicial notice of appointment of mediator (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Correspondence with I. Nasatir re Porter cross examination strategy (.1);	0.10	\$62.50
4/17/2023	Timothy Burns	Reviewed email from PSZJ re magistrate hearing (.1) and Bankruptcy Court hearing (.1);	0.20	\$195.00
4/17/2023	Jesse Bair	Review the Diocese's response to the Committee's preliminary injunction witness objections (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Additional correspondence with I. Nasatir re potential preliminary injunction insurance exhibit (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Review J. Stang correspondence to the Committee re case developments and potential motion to dismiss delay (.1);	0.10	\$62.50
4/18/2023	Jesse Bair	Review revised draft response to the Diocese's letter re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/18/2023	Timothy Burns	Participate in call with the mediator re upcoming settlement call and related issues (.5);	0.50	\$487.50
4/18/2023	Jesse Bair	Review K. Brown correspondence re preliminary injunction arguments in advance of hearing (.1);	0.10	\$62.50
4/18/2023	Jesse Bair	Review Order setting additional pre-settlement conference call with Judge Cave and PVO (.1);	0.10	\$62.50
4/19/2023	Jesse Bair	Review Order sustaining the Diocese's fifth omnibus claims objection (.3);	0.30	\$187.50
4/19/2023	Jesse Bair	Review supplemental letter to the court from the Diocese re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/19/2023	Jesse Bair	Review various correspondence with J. Stang, the Diocese, the US Trustee, the Committee, and state court counsel re potential extension of the preliminary injunction and parameters re same (.2);	0.20	\$125.00
4/19/2023	Timothy Burns	Participate in call with state court counsel re Arrowood issues (.8);	0.80	\$780.00
4/20/2023	Timothy Burns	Participate in conference with J. Bair re upcoming settlement call with Judge Cave and PVO (.1);	0.10	\$97.50
4/20/2023	Jesse Bair	Analyze C. Moore expert report for insurance issues and critiques (.5); draft summary of same for PSZJ (.2);	0.70	\$437.50
4/20/2023	Jesse Bair	Participate in conference with T. Burns re preliminary injunction hearing outcome and settlements issues (.2);	0.20	\$125.00
4/20/2023	Jesse Bair	Participate in conference with T. Burns re upcoming settlement call with Judge Cave and PVO (.1);	0.10	\$62.50

4/20/2023	Timothy Burns	Participate in conference with J. Bair re preliminary injunction hearing outcome and settlements issues (.2);	0.20	\$195.00
4/20/2023	Timothy Burns	Participate in conference with PSZJ team re ongoing case issues for insurance purposes (.9);	0.90	\$877.50
4/20/2023	Jesse Bair	Review K. Dine correspondence to the Committee re preliminary injunction hearing outcome and mediation developments (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Analyze Judge Cave's mediation scheduling order (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Review correspondence with PSZJ team re upcoming settlement call with Judge Cave and PVO and strategy re same (.1);	0.10	\$62.50
4/21/2023	Timothy Burns	Prepare for settlement call with Judge Cave (.4); participate in settlement call (1.0); participate in portion of state court counsel meeting re outcome of same and related mediation issues (.5); participate in conference with J. Bair re outcome of same (.1);	2.00	\$1,950.00
4/21/2023	Jesse Bair	Review B. Michael correspondence re motion to dismiss adjournment (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Participate in pre-settlement conference call with Judge Cave and PVO re structure and logistics for upcoming case mediation sessions (1.0);	1.00	\$625.00
4/21/2023	Jesse Bair	Participate in conference with T. Burns re outcome of state court counsel meeting (.1);	0.10	\$62.50
4/22/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.2);	0.20	\$125.00
4/22/2023	Jesse Bair	Analyze B. Cawley memorandum re recent BSA decision re insurance issues potentially impacting DRVC case (.6);	0.60	\$375.00
4/24/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy re upcoming mediation sessions (.2);	0.20	\$195.00
4/24/2023	Jesse Bair	Correspondence with B. Michael re upcoming mediation sessions (.1); correspondence with T. Burns and K. Dempski re same (.1);	0.20	\$125.00
4/24/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy re upcoming mediation sessions (.2);	0.20	\$125.00
4/24/2023	Jesse Bair	Review correspondence from B. Michael re impacted CVA cases if the Court denies the preliminary injunction (.1); review spreadsheet re same (.1);	0.20	\$125.00
4/24/2023	Jesse Bair	Review minute entries in insurance district court actions re upcoming mediation sessions (.1);	0.10	\$62.50
4/24/2023	Jesse Bair	Review correspondence from B. Michael and J. Stang re weekly case strategy meeting (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review information re logistics for upcoming May mediation sessions (.1);	0.10	\$62.50
4/25/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy re upcoming mediation sessions (.1);	0.10	\$97.50
4/25/2023	Jesse Bair	Prepare for hearing on professional interim fee applications (.1); participate in hearing re BB's interim fee application (.7);	0.80	\$500.00

4/25/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy re upcoming mediation sessions (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review CFN's objection to the revised sale order (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review correspondence with the Committee and B. Michael re May 19 mediation session (.1);	0.10	\$62.50
4/26/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy in advance of upcoming mediation sessions (.1);	0.10	\$62.50
4/26/2023	Timothy Burns	Review correspondence with PSZJ and the Diocese re expert issues (.1);	0.10	\$97.50
4/26/2023	Jesse Bair	Review and edit initial draft of mediation confidentiality agreement circulated by Arrowood (.1); correspondence with PSZJ re potential edits to same (.1);	0.20	\$125.00
4/26/2023	Jesse Bair	Review draft post-trial order re preliminary injunction evidence and insurance information (.2); review correspondence with B. Michael, I. Nasatir, K. Brown, and G. Greenwood re suggested edits to same (.2);	0.40	\$250.00
4/26/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy in advance of upcoming mediation sessions (.1);	0.10	\$97.50
4/27/2023	Timothy Burns	Participate in conference with J. Bair re Arrowood strategy (.2);	0.20	\$195.00
4/27/2023	Jesse Bair	Review and edit initial draft of the Committee's mediation statement (.6); review I. Nasatir's suggested edits to same (.2); review correspondence from K. Dine and B. Michael re additional potential edits to same (.1);	0.90	\$562.50
4/27/2023	Jesse Bair	Analysis re various insurance questions from Claro re supplemental insurer exposure and allocation analysis (.3); correspondence with Claro re same (.1);	0.40	\$250.00
4/27/2023	Jesse Bair	Review mediator directive re May mediation sessions (.1);	0.10	\$62.50
4/27/2023	Jesse Bair	Review final version of stipulation and order re preliminary injunction evidence and certain insurance information (.1);	0.10	\$62.50
4/27/2023	Jesse Bair	Review correspondence with Arrowood, the mediators, and B. Michael re mediation confidentiality and process issues (.2);	0.20	\$125.00
4/27/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy (.2);	0.20	\$125.00
4/27/2023	Jesse Bair	Review correspondence from B. Michael re potential mediation agenda for May 10 session (.1);	0.10	\$62.50
4/27/2023	Timothy Burns	Review correspondence from PSZJ re upcoming mediation session (.1);	0.10	\$97.50
4/28/2023	Jesse Bair	Analyze and respond to further Claro insurance questions re supplemental insurance exposure and allocation analysis (.3);	0.30	\$187.50

4/28/2023	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re mediation strategy (1.3); participate in post-call with PSZJ and T. Burns re same (.4);	1.80	\$1,125.00
4/28/2023	Timothy Burns	Review and revise the Committee's mediation statement (.9); participate in call with J. Bair re same (.2); participate in state court counsel meeting for insurance purposes re mediation strategy (1.3); participate in post-meeting call with PSZJ and J. Bair re same (.4);	2.80	\$2,730.00
4/28/2023	Jesse Bair	Review and edit revised version of the Committee's mediation statement incorporating edits from T. Burns (.3); participate in call with T. Burns re same (.2);	0.50	\$312.50
4/28/2023	Jesse Bair	Review alternative mediation confidentiality agreement circulated by Judge Cave (.1);	0.10	\$62.50
4/28/2023	Jesse Bair	Review and edit revised mediation confidentiality agreement circulated by Arrowood (.1); correspondence with B. Michael and J. Stang re same (.1);	0.20	\$125.00
4/28/2023	Jesse Bair	Review and edit most recent draft of the Committee's mediation statement (.4); correspondence with T. Burns re same (.1);	0.50	\$312.50
4/29/2023	Jesse Bair	Review LMI and the Diocese's letter to Judge Cronan re settlement update (.1);	0.10	\$62.50
4/29/2023	Jesse Bair	Review revised version of the Committee's mediation statemen (.1); review correspondence with B. Michael and state court counsel re same (.1);	0.20	\$125.00
4/30/2023	Jesse Bair	Analysis re Arrowood Guarantee Fund exposure (.2); correspondence with I. Nasatir, J. Stang, and state court counsel re same (.2);	0.40	\$250.00
<b>Total Hours and Fees</b>			<b>87.20</b>	<b>\$58,710.50</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/1/2023	First Quarter 2023 PACER (Public Access to Court Electronic Records)	\$98.90
<b>Total Expenses</b>		<b>\$98.90</b>

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.80	\$360.00	\$648.00
Brenda Horn	0.80	\$360.00	\$288.00
Brian Cawley	17.90	\$420.00	\$7,518.00
Jesse Bair	41.90	\$625.00	\$26,187.50
Leakhena Au	0.10	\$420.00	\$42.00
Nathan Kuenzi	0.10	\$420.00	\$42.00



<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy Burns	24.60	\$975.00	\$23,985.00

**Total Due This Invoice: \$58,809.40**